

**Attachment C**  
**Trainer Refinery Compliance Background Review**  
**2011 - November 1, 2016**

Date <sup>1</sup>	Facility	Plan Approval / Operating Permit #	Nature of Documented Conduct	Type of Department Action	Status: Litigation Existing / Continuing or Corrected / Date	Dollar Amount Penalty
06/01/2013	Trainer Refinery	NPDES PA0012637	Excursion of CBOD20 and CBDO20 % removal permit limits	NOV	Included in penalty settled on 7/16/2014	
05/01/2013	Trainer Refinery	NPDES PA0012637	Excursion of total organic carbon, CBOD20, and CBDO20 % removal permit limits	NOV	Included in penalty settled on 7/16/2014	
04/15/2013	Trainer Refinery	NPDES PA0012637	Less than one quart of oil released to Marcus Hook Creek	NOV	Included in penalty settled on 7/16/2014	
02/07/2013	Trainer Refinery	NPDES PA0012637	Estimated one quart of oil released to Delaware River	NOV	Included in penalty settled on 7/16/2014	
01/15/2013	Trainer Refinery	NPDES PA0012637	Estimated one to two gallons of kerosene released to Stony Creek	NOV	Included in penalty settled on 7/16/2014	
09/18/2012	Trainer Refinery	NPDES PA0012637	Less than 1 quart of diesel fuel released to Stony Creek	NOV	Included in penalty settled on 7/16/2014	
09/11/2012	Trainer Refinery	NPDES PA0012637	Less than 1 quart of oil released to Stony Creek	NOV	Included in penalty settled on 7/16/2014	
09/03/2012	Trainer Refinery	NPDES PA0012637	Estimated 1/2 gallon of oil released to Stony Creek	NOV	Included in penalty settled on 7/16/2014	
<b>Other PADEP Regulated Programs</b>						
06/14/2011	Trainer Refinery	Storage Tank Program	Sodium Hypochlorite Spill NOV	NOV	Closed	Unknown
02/02/2010	Trainer Refinery	Storage Tank Program	PADEP Tank Penalty	Penalty	Settled	\$54,000

[1] Monroe Energy, LLC purchased the Trainer Refinery from Phillips66 on June 22, 2012.

**Attachment D**  
**Air Pollution Control Act Compliance Review Form**  
**List of Deviations**

Monroe Energy, LLC informs the Department on a regular basis regarding incidents and deviations through various reports, including but not limited to, CEMS reports, LDAR reports, Title V deviation and certification reports, incident reports, and Refinery MACT reports.

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**ATTACHMENT B**  
**LETTER APPROVAL FOR TRANSFER OF ERCS**

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**Monroe Energy, LLC**  
4101 Post Road  
Trainer, PA 19061  
(610) 364-8000

December 18, 2015

Mr. Krishnan Ramamurthy  
Chief, Divisions of Permits  
Pennsylvania Department of Environmental Protection  
400 Market Street  
Harrisburg, PA 17101

**RE: Import Request of Maryland VOC Emission Reduction Credit**

Dear Mr. Ramamurthy:

Please accept this request to transfer 25.0 tons of VOC emission reduction credits ("ERCs") currently held by Monroe Energy LLC. The subject ERCs were purchased by Monroe Energy to satisfy the requirement for installation of Cooling Towers. The Monroe Energy facility is in Trainer Borough, Delaware County, Pennsylvania and located on 4101 Post Road. These ERCs should be certified by the Pennsylvania Department of Environmental Protection ("PADEP") for Monroe Energy as listed in Pennsylvania's ERC Registry.

Please provide Monroe Energy LLC with documentation evidencing the successful transfer of the ERCs to Monroe. Since this project has become time sensitive, we would greatly appreciate the Department's cooperation in processing the transfer request as expeditiously as possible.

Thank you for your assistance in the processing of this ERC transfer request. Should any questions arise, please feel free to call me at 610-364-8354.

Sincerely,

Matthew Torell, P.E.  
Environmental Leader



**Monroe Energy, LLC**  
4101 Post Road  
Trainer, PA 19061  
(610) 364-8000

December 18, 2015

Mr. Krishnan Ramamurthy  
Bureau of Air Quality Control  
Pennsylvania Department of Environmental Protection  
400 Market Street  
Harrisburg, PA 17105

**RE: Import Emission Reduction Credit Transfer Request**

Dear Mr. Ramamurthy:

Please accept this request to transfer 15.25 tons of VOC emission reduction credits ("ERCs") currently held by Element Markets, LLC to Monroe Energy, LLC. The subject ERCs are required to satisfy requirements for Installation of Cooling Towers at the facility in Delaware County, Pennsylvania, and located on 4101 Post Road. These ERCs should be certified by the Pennsylvania Department of Environmental Protection ("PADEP") for Monroe Energy, LLC as listed in Pennsylvania's ERC Registry.

Please provide Element Markets, LLC and Monroe Energy, LLC with documentation evidencing the successful transfer of the ERCs to Monroe Energy. Since this project has become time sensitive, we would greatly appreciate the Department's cooperation in processing the transfer request as expeditiously as possible.

Thank you for your assistance in the processing of this ERC transfer request. Should any questions arise, please feel free to call me at 610-364-8354.

Sincerely,

Matthew Torell, P.E.  
Environmental Leader



**Monroe Energy, LLC**  
4101 Post Road  
Trainer, PA 19061  
(610) 364-8000

December 18, 2015

Mr. Krishnan Ramamurthy  
Bureau of Air Quality Control  
Pennsylvania Department of Environmental Protection  
400 Market Street  
Harrisburg, PA 17105

**RE: VOC Emission Reduction Credit Transfer Request**

Dear Mr. Ramamurthy:

Monroe Energy, LLC has executed an agreement to purchase 24.2 tons of VOC Severe Emission Reduction Credits ("ERCs") currently held by Element Market. These "ERCs" were created/originated by the shutdown of the facility in Philadelphia County, 2550 Grant Ave. Philadelphia, Pennsylvania.

Please provide Element Markets, LLC and Monroe Energy with documentation evidencing the successful transfer of the ERCs from Element Markets to Monroe Energy.

Thank you for your assistance in the processing of this ERC transfer request. If any questions arise, please feel free to call me at 610-364-8354.

Sincerely,

Matthew Torell, P.E.  
Environmental Leader

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**ATTACHMENT C**  
**CONTEMPORANEOUS EMISSION INCREASES/DECREASES (TABLE C-10 FROM**  
**JANUARY 29, 2015 PERMIT APPLICATION)**

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**Table C-10**  
**Monroe Energy, LLC - Trainer, PA Refinery**  
**Contemporaneous Emission Increases/Decreases**

Date <sup>(a)</sup>	Plan Approval/ RFD	Description	Note	Emission Increase/Decrease	
				NO <sub>x</sub>	VOC
				(tpy)	
04/04/2003	23-0003E	Gasoline & Diesel Desulfurization Project		0.00	14.39
04/18/2005	23-0003G	Platformer Heater Modification		0.00	4.02
05/20/2005	23-0003H	Isocracker Unit Modification		18.00	0.17
10/03/2006	23-0003I	Two New Boilers		23.70	2.60
05/04/2007	23-0003J	Clean Fuel Project	(b)	39.00	0.00
10/19/2007	23-0003K	Modification to PA 23-0003G		21.89	0.00
10/23/2008	23-0003M	Cooling Tower		0.00	0.74
12/08/2008	23-0003N	FCCU Feed Heater Modification		0.00	(1.10)
02/09/2009	23-0003O	ReVAP	(c)		
04/10/2009	23-0003P	2010 Turnaround		1.59	0.26
09/28/2009	23-0003Q	Boiler MACT Phase II Application		0.00	0.00
12/04/2009	RFD	Light Components Loading		0.07	0.14
12/23/2009	23-0003R	Aromatic Saturation Unit Project	(c)		
10/01/2010	23-0003S	Flare Gas Recovery Project		0.00	3.58
10/01/2010	23-0003T	Amended Alky ReVAP Project	(c)		
11/09/2011	23-0003U	Two New Boilers (Replace Boiler 8)(withdrawn)			
04/12/2012	23-0003V	Diesel Heater Project	(c)		
08/09/2012	RFD	Main Flare - Turnaround		0.00	0.09
01/10/2013	RFD #3418	Propane Loading into Trucks		0.00	0.00
04/04/2013	RFD #3561	Peabody Heater Modifications		0.00	0.00
04/23/2013	RFD #3596	Max Jet		0.00	0.21
05/17/2013	23-0003W	D2 Project	(d)	0.00	3.44
03/13/2014	23-0003X	400 kW Emergency Generator	(e)	1.19	0.01
10/14/2014	23-0003Y	Proposed Boiler 13 (Replace Boiler 8)		11.70	1.98
Total Contemporaneous Emission Increases with Proposed Boiler 13				117.14	0.00
Total Contemporaneous Emission Reduction Credits Required				(f)	0.00
Total Emission Reduction Credits Previously Provided with PA 23-0003X				(g)	N/A
Net Emission Reduction Credits Required/Provided with PA 23-0003Y				(h)	0.00
TBD	TBD	Proposed Cooling Tower Project		1.44	67.38
5-year Aggregation				1.44	69.38
10-year Aggregation				1.44	69.38
Significance Level				25	25
Total Emission Reduction Credits Required <sup>(f)</sup>				N/A	90 tons

Notes:

<sup>(a)</sup> Based on net emission increases occurring over a 10 year period.

<sup>(b)</sup> This application modified an existing Plan Approval No. 23-0003E.

<sup>(c)</sup> Application/Plan Approval was withdrawn.

<sup>(d)</sup> Project triggered NNSR for VOC, 40 tons of VOC ERCs were purchased, cumulative contemporaneous emissions increase reset back to zero.

<sup>(e)</sup> Project triggered NNSR for NO<sub>x</sub>, 147.6 tons of NO<sub>x</sub> ERCs were purchased, cumulative contemporaneous emissions increase reset back to zero with an additional 1.4 tons available for future use.

<sup>(f)</sup> At an offset ratio of 1.3:1 per 25 Pa. Code § 127.210.

<sup>(g)</sup> Application/Plan Approval 23-0003U was withdrawn and desired back-up capacity now being replaced with proposed Boiler 13. Aggregate NO<sub>x</sub> ERCs required is reduced accordingly for those already provided under PA 23-0003X, per conversations with Virendra Trivedi (PADEP) on July 10, 2014.

<sup>(h)</sup> Project triggered NNSR for NO<sub>x</sub>, 6.08 tons of NO<sub>x</sub> ERCs were purchased, cumulative contemporaneous emission increase reset back to zero.



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**ATTACHMENT D**  
**MUNICIPAL NOTIFICATION LETTERS**

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**Monroe Energy, LLC**  
**4101 Post Road**  
**Trainer, PA 19061**  
**(610) 364-8000**

November 4, 2016

**CERTIFIED MAIL 7015 1520 0000 5967 8004**

Ms. Regina Beck  
Council President  
Trainer Borough  
824 Main Street  
Trainer, PA 19061

**Re: PADEP-Required Borough Notification – Plan Approval Application**

Dear Sir or Madam:

Pursuant to Commonwealth of Pennsylvania's Administrative Code (Section 1905-A), Cooperation with Municipalities, which became effective April 17, 1984, Monroe Energy, LLC (Monroe) hereby notifies the County of Delaware of its submittal of a Plan Approval Application to the Pennsylvania Department of Environmental Protection (PADEP). Monroe currently operates a petroleum refinery located in Trainer, PA (Trainer Refinery). The purpose of this Plan Approval Application is for the approval to transfer and use emission reduction credits (ERCs) at Monroe's Trainer Refinery. In accordance with the provisions of Title 25, Chapter 127, Section 127.208, Monroe will use these ERCs to offset volatile organic compound (VOC) emission increases that have been permitted or may be permitted by PADEP at the Trainer Refinery. This Plan Approval Application does not modify any operations at the Trainer Refinery, and is solely intended for the approval of the transfer and use of the ERCs.

PADEP will accept comments on the Plan Approval Application during a 30-day period that begins upon your receipt of this notification. A copy of the Plan Approval Application is available for review at PADEP's Norristown office. Any comments concerning the application should be transmitted to PADEP within 30 days of your receipt of this letter. If you have any questions or concerns regarding the above information, please contact Mr. Matthew Torell, P.E., Environmental Lead, at (610) 364-8399.

Sincerely,

Haley Ilg  
Air Permitting Compliance Lead



**Monroe Energy, LLC**  
**4101 Post Road**  
**Trainer, PA 19061**  
**(610) 364-8000**

November 4, 2016

**CERTIFIED MAIL 7015 1520 0000 5967 7984**

Mr. Mario J. Civera, Jr.  
Chairman  
Delaware County Council  
Court House/Government Center  
201 W. Front Street  
Media, PA 19063

**Re: PADEP-Required County Notification – Plan Approval Application**

Dear Sir or Madam:

Pursuant to Commonwealth of Pennsylvania's Administrative Code (Section 1905-A), Cooperation with Municipalities, which became effective April 17, 1984, Monroe Energy, LLC (Monroe) hereby notifies the County of Delaware of its submittal of a Plan Approval Application to the Pennsylvania Department of Environmental Protection (PADEP). Monroe currently operates a petroleum refinery located in Trainer, PA (Trainer Refinery). The purpose of this Plan Approval Application is for the approval to transfer and use emission reduction credits (ERCs) at Monroe's Trainer Refinery. In accordance with the provisions of Title 25, Chapter 127, Section 127.208, Monroe will use these ERCs to offset volatile organic compound (VOC) emission increases that have been permitted or may be permitted by PADEP at the Trainer Refinery. This Plan Approval Application does not modify any operations at the Trainer Refinery, and is solely intended for the approval of the transfer and use of the ERCs.

PADEP will accept comments on the Plan Approval Application during a 30-day period that begins upon your receipt of this notification. A copy of the Plan Approval Application is available for review at PADEP's Norristown office. Any comments concerning the application should be transmitted to PADEP within 30 days of your receipt of this letter. If you have any questions or concerns regarding the above information, please contact Mr. Matthew Torell, P.E., Environmental Lead, at (610) 364-8399.

Sincerely,

  
Haley Ilg  
Air Permitting Compliance Lead

7015 1520 0000 5967 8004

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